

# EXHIBIT 13

1 JAMES M. KINDER  
5775 Caminito Pulsera  
2 La Jolla, CA 92037-7160  
Telephone: (858) 551-8852  
3 Facsimile: (858) 551-8859

4 || Plaintiff in Pro Per

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SEP 18 900<sup>3</sup>  
ONE  
BUT NOT FILED

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO**

11 JAMES M. KINDER, } CASE NO. 5/C 818815  
12 Plaintiff, }  
13 v. } COMPLAINT FOR DAMAGES FOR  
14 COLLECTECH SYSTEMS, INC., } VIOLATION(S) OF TELEPHONE  
15 and DOES 1 through 100 inclusive, } CONSUMER PROTECTION ACT OF  
16 Defendants. } 1991 ("TCPA")  
[47 U.S.C. §227 & 47 C.F.R. §64.1200]

18 Plaintiff JAMES M. KINDER alleges:

19       1. Plaintiff is bringing this action pursuant to the provisions of the Telephone  
20 Consumer Protection Act of 1991 (47 U.S.C. §227 and 47 C.F.R. §64.1200 – “TCPA”).

21       2. Plaintiff is, and at all times herein mentioned was, a resident of the County  
22 of San Diego, State of California.

23       3. Defendants are, and at all times herein mentioned were, business organizations of  
24 unknown form, doing business in the County of San Diego, State of California.

25       4. Plaintiff is unaware of the true names and capacities of defendants sued herein as  
26 DOES 1 through 100, inclusive, and therefore sues these defendants by such fictitious names.

27 Plaintiff will amend this complaint to allege their true names and capacities when ascertained.

28 Plaintiff is informed and believes and thereon alleges that each of the fictitiously named

1 defendants is responsible in some manner for the occurrences herein alleged and that plaintiff's  
2 damages as herein alleged were proximately caused by their conduct.

3       5. At all times herein mentioned each defendant was the partner, agent and employee  
4 of each co-defendant herein and was at all times acting within the scope of such partnership,  
5 agency and employment and each defendant ratified the conduct of each co-defendant herein.

6       6. Even though the TCPA is a federal statute, state courts have exclusive jurisdiction  
7 over private actions brought pursuant to its provisions.

8       7. A few years ago, plaintiff, for valuable consideration, obtained the voice mail  
9 telephone number (619) 999-9999. Plaintiff obtained this number so that his clients and  
10 customers, as well as potential clients and customers, would easily remember it, thereby making  
11 it an extremely valuable number.

12       8. Subdivision (b)(1)(A)(iii) of section 227 of title 47 of the United States Code and  
13 subdivision (a)(1)(iii) of section 64.12000 of title 47 of the Code of Federal Regulations make it  
14 unlawful for any person within the United States to make any call using any automatic telephone  
15 dialing system to any telephone number assigned to a paging service, cellular telephone service,  
16 specialized mobile radio service, or other radio common carrier service, or any service for which  
17 the called party is charged for the call.

18       9. Defendants are primarily engaged in the business of debt collection and in  
19 connection with such business make telephone calls using an automatic telephone dialing system.

20       10. The telephone number (619) 999-9999 is assigned to a paging service, which also  
21 provides voice mail service.

22       11. Defendants have violated the TCPA by frequently calling plaintiff's voice mail at  
23 (619) 999-9999, using an automatic telephone dialing system.

24       12. Subdivision (b)(3) of section 227 of title 47 of the United States Code permits a  
25 private right of action in state court for violation of the above subsection. Plaintiff may obtain  
26 relief in the form of injunctive relief, or plaintiff may recover \$500.00 for each violation, or both.  
27 If the court finds that defendants' violations were willful or knowing, it may, in its discretion,  
28 award up to three times that amount.

1       13. Defendants have made at least eight (8) calls to plaintiff's voice mail number.  
2       WHEREFORE plaintiff prays for judgment against defendants, and each of them, as  
3 follows:

10 Dated: September 15, 2003

JAMES M. KINDER, Plaintiff in Pro Per

<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO</b> <input type="checkbox"/> COUNTY COURTHOUSE, 220 W. BROADWAY, SAN DIEGO, CA 92101-3814 <input type="checkbox"/> HALL OF JUSTICE, 330 W. BROADWAY, SAN DIEGO, CA 92101-3827 <input type="checkbox"/> FAMILY COURT, 1555 6 <sup>TH</sup> AVE., SAN DIEGO, CA 92101-3296 <input type="checkbox"/> MADGE BRADLEY BLDG., 1409 4 <sup>TH</sup> AVE., SAN DIEGO, CA 92101-3105 <input type="checkbox"/> KEARNY MESA, 8950 CLAIREMONT MESA BLVD., SAN DIEGO, CA 92123-1187 <input type="checkbox"/> NORTH COUNTY DIVISION, 325 S. MELROSE DR., VISTA, CA 92083-6643 <input type="checkbox"/> EAST COUNTY DIVISION, 250 E. MAIN ST., EL CAJON, CA 92020-3941 <input type="checkbox"/> RAMONA, 1428 MONTECITO RD., RAMONA, CA 92065-5200 <input type="checkbox"/> SOUTH COUNTY DIVISION, 500 3 <sup>RD</sup> AVE., CHULA VISTA, CA 91910-5649 <input type="checkbox"/> JUVENILE COURT, 2851 MEADOW LARK DR., SAN DIEGO, CA 92123-2792		<b>F I L E D</b> Clerk of the Superior Court <b>OCT 08 2003</b> <b>By: C. VASQUEZ, Deputy</b>
PLAINTIFF(S)/PETITIONER(S)		
JAMES M. KINDER		
<b>DEFENDANT(S)/RESPONDENT(S)</b> COLLECTIONS SYSTEMS INC.		Judge: JOHN S. EINHORN Dept.: 24
<b>CLERK'S CERTIFICATE OF SERVICE BY MAIL</b> (CCP 1013a(4))		CASE NUMBER: <b>GIC818815</b>

I, STEPHEN LOVE, certify that: I am not a party to the above-entitled case; that on the date shown below, I served the following document(s):

**ORDER DENYING PERMISSION TO FILE NEW LITIGATION**  
**DATED: OCTOBER 7, 2003**

On the parties shown below by placing a true copy in a separate envelope, addressed as shown below; each envelope was then sealed and, with postage thereon fully prepaid, deposited in the United States Postal Service at:

San Diego     Vista     El Cajon     Chula Vista     Oceanside     Ramona,    California.

JAMES KINDER 5775 CAMINITO PULSERA LA JOLLA, CA 92037-7160	
--	--

**STEPHEN LOVE**  
**CLERK OF THE SUPERIOR COURT**

Date: October 8, 2003

By: \_\_\_\_\_, Deputy

C. Vasquez

**CLERK'S CERTIFICATE OF MAILING**

1  
2 F I L E D  
3 Clerk of the Superior Court  
4 OCT 07 2003  
5 By: C. VASQUEZ, Deputy  
6  
7  
8

THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF SAN DIEGO

10  
11 JAMES M. KINDER, } Case No: GIC 818815  
12 Plaintiff, } ORDER DENYING PERMISSION TO FILE  
13 vs. } NEW LITIGATION (C.C.P. § 391.7b)  
14 COLLECTIONS SYSTEMS INC., }  
15 Defendant. }  
16

17 The court has reviewed the papers filed by plaintiff on September 18, 2003. JAMES M.  
18 KINDER'S application for an order granting vexatious litigant permission to file new litigation  
19 is denied pursuant to California Code of Civil Procedure § 391.7 for the reasons stated below.

20 In his complaint plaintiff alleges that defendant has initiated telephone calls to his phone  
21 in violation of the federal Telephone Consumer Protection Act of 1991. The specific violation  
22 alleged is multiple calls from an automated dialing system to his voice mail, which is assigned to  
23 a paging service.

24 Plaintiff has not filed any declarations, nor is his Complaint verified. Without some form  
25 of evidence this court has nothing but bare allegations upon which to base it's ruling. These  
26 allegations, both in their facts and evidentiary value, are insufficient for this court to conclude  
27 this action has sufficient potential merit to allow plaintiff to proceed and is not simply filed to  
28 harass the defendant. In addition, plaintiff is aware of the factual and legal issues presented by

1 this action and appears to have drafted his unverified complaint ambiguously in order to avoid  
2 those same issues.

3 This court takes Judicial Notice pursuant to California Evidence Code § 452 of the file in  
4 case number GIC 789588. That action involved many of the same issues as does this action.  
5 This Court specifically takes Judicial Notice of the order granting summary judgment in favor of  
6 the defendant wherein the court found, with respect to plaintiff's phone number, as follows: "the  
7 number is not "assigned to a paging service" because it is undisputed that the number is not  
8 longer used in conjunction with a pager. Instead, the number is assigned to a voicemail service  
9 and Mr. Kinder is not charged based on the amount of calls received. The ordinary and plain  
10 meaning of the term "paging service" suggests a paid service in which the user is alerted each  
11 time a call is made to the number. This is not analogous to a voicemail service in which the user  
12 periodically calls the service to retrieve messages." Because the only evidence before this court  
13 is that the number is not assigned to a paging service, as is required by 47 U.S.C. 227, the  
14 complaint has no merit.

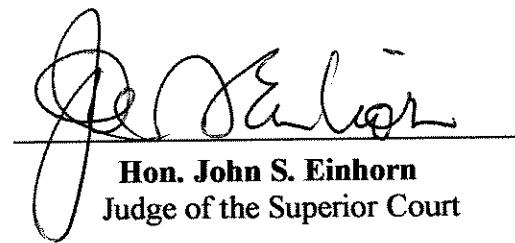
15 This court further takes note that there were factual issues as to whether the 999-9999  
16 number was randomly generated or was a default number, or was otherwise intentionally entered  
17 in the system, and whether a random number generator was, in fact, used. Those same issues are  
18 present here and plaintiff makes no attempt to provide this court with any evidence that they  
19 would be resolved in his favor.

20 Plaintiff is has a legal education and, based thereon, is presumed to understand the legal  
21 impediments these findings present in the present case..

22 Therefore, this court finds that this litigation does not have merit and has been filed for  
23 the purpose of harassment and/or delay.

24 IT IS SO ORDERED.

25 Dated this 10 day of October, 2003. By:



Hon. John S. Einhorn  
Judge of the Superior Court

26  
27  
28

# EXHIBIT 14

1 JAMES M. KINDER  
5775 Caminito Pulsera  
2 La Jolla, CA 92037-7160  
3 Telephone: (858) 551-8852  
3 Facsimile: (858) 551-8859

4 || Plaintiff in Pro Per

RECEIVED

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JUL

BUT NOT FILED

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO**

11 JAMES M. KINDER,  
12 Plaintiff,  
13  
14 v.  
15 TRIAD FINANCIAL CORPORATION  
and DOES 1 through 100, inclusive,  
16 Defendants.

CASE NO. **GIC** 818814  
COMPLAINT FOR DAMAGES FOR  
VIOLATION(S) OF TELEPHONE  
CONSUMER PROTECTION ACT OF  
1991 ("TCPA")  
[47 U.S.C. §227 & 47 C.F.R. §64.1200]

18 Plaintiff JAMES M. KINDER alleges:

19       1. Plaintiff is bringing this action pursuant to the provisions of the Telephone  
20 Consumer Protection Act of 1991 (47 U.S.C. §227 and 47 C.F.R. §64.1200 – “TCPA”).

21       2. Plaintiff is, and at all times herein mentioned was, a resident of the County  
22 of San Diego, State of California.

23       3. Defendants are, and at all times herein mentioned were, business organizations of  
24 unknown form, doing business in the County of San Diego, State of California.

25       4. Plaintiff is unaware of the true names and capacities of defendants sued herein as  
26 DOES 1 through 100, inclusive, and therefore sues these defendants by such fictitious names.

27 Plaintiff will amend this complaint to allege their true names and capacities when ascertained.

28 Plaintiff is informed and believes and thereon alleges that each of the fictitiously named

1 defendants is responsible in some manner for the occurrences herein alleged and that plaintiff's  
2 damages as herein alleged were proximately caused by their conduct.

3       5.       At all times herein mentioned each defendant was the partner, agent and employee  
4 of each co-defendant herein and was at all times acting within the scope of such partnership,  
5 agency and employment and each defendant ratified the conduct of each co-defendant herein.

6       6.       Even though the TCPA is a federal statute, state courts have exclusive jurisdiction  
7 over private actions brought pursuant to its provisions.

8       7.       A few years ago, plaintiff, for valuable consideration, obtained the voice mail  
9 telephone number (619) 999-9999. Plaintiff obtained this number so that his clients and  
10 customers, as well as potential clients and customers, would easily remember it, thereby making  
11 it an extremely valuable number.

12       8.       Subdivision (b)(1)(A)(iii) of section 227 of title 47 of the United States Code and  
13 subdivision (a)(1)(iii) of section 64.12000 of title 47 of the Code of Federal Regulations make it  
14 unlawful for any person within the United States to make any call using any automatic telephone  
15 dialing system to any telephone number assigned to a paging service, cellular telephone service,  
16 specialized mobile radio service, or other radio common carrier service, or any service for which  
17 the called party is charged for the call.

18       9.       Defendants are primarily engaged in the business of debt collection, and in  
19 connection with such business make telephone calls using an automatic telephone dialing system.

20       10.      The telephone number (619) 999-9999 is assigned to a paging service, which also  
21 provides voice mail service.

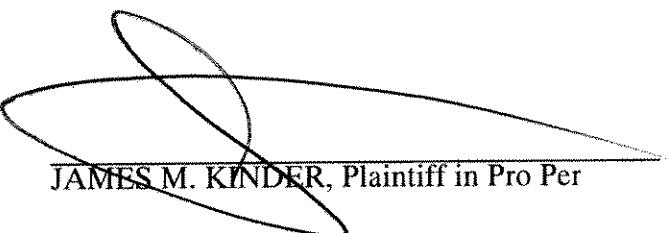
22       11.      Defendants have violated the TCPA by frequently calling plaintiff's voice mail at  
23 (619) 999-9999, using an automatic telephone dialing system.

24       12       Subdivision (b)(3) of section 227 of title 47 of the United States Code permits a  
25 private right of action in state court for violation of the above subsection. Plaintiff may obtain  
26 relief in the form of injunctive relief, or plaintiff may recover \$500.00 for each violation, or both.  
27 If the court finds that defendants' violations were willful or knowing, it may, in its discretion,  
28 award up to three times that amount.

1           13. Defendants have made at least nine (9) calls to plaintiff's voice mail number.  
2           WHEREFORE plaintiff prays for judgment against defendants, and each of them, as  
3 follows:

4           1. For an award of \$500.00 for each violation of 47 U.S.C. §227 or 47 C.F.R.  
5           §64.1200;  
6           2. For an award of \$1,500.00 for each such violation found to have been willful;  
7           3. For costs of suit herein incurred; and  
8           4. For such further relief as the Court deems proper.

9  
10 Dated: September 15, 2003

11             
12 JAMES M. KINDER, Plaintiff in Pro Per

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<b>SUPERIOR COURT OF CALIFORNIA, C. J. NY OF SAN DIEGO</b>	
<input type="checkbox"/> COUNTY COURTHOUSE, 220 W. BROADWAY, SAN DIEGO, CA 92101-3814 <input type="checkbox"/> HALL OF JUSTICE, 330 W. BROADWAY, SAN DIEGO, CA 92101-3827 <input type="checkbox"/> FAMILY COURT, 1555 6 <sup>TH</sup> AVE., SAN DIEGO, CA 92101-3296 <input type="checkbox"/> MADGE BRADLEY BLDG., 1409 4 <sup>TH</sup> AVE., SAN DIEGO, CA 92101-3105 <input type="checkbox"/> KEARNY MESA, 8950 CLAIREMONT MESA BLVD., SAN DIEGO, CA 92123-1187 <input type="checkbox"/> NORTH COUNTY DIVISION, 325 S. MELROSE DR., VISTA, CA 92083-6643 <input type="checkbox"/> EAST COUNTY DIVISION, 250 E. MAIN ST., EL CAJON, CA 92020-3941 <input type="checkbox"/> RAMONA, 1428 MONTECITO RD., RAMONA, CA 92065-5200 <input type="checkbox"/> SOUTH COUNTY DIVISION, 500 3 <sup>RD</sup> AVE., CHULA VISTA, CA 91910-5649 <input type="checkbox"/> JUVENILE COURT, 2851 MEADOW LARK DR., SAN DIEGO, CA 92123-2792	
PLAINTIFF(S)/PETITIONER(S)	
JAMES M. KINDER	
DEFENDANT(S)/RESPONDENT(S)	
TRIAD FINANCIAL CORP.	
CLERK'S CERTIFICATE OF SERVICE BY MAIL (CCP 1013a(4))	

F I L E D

Clerk of the Superior Court

OCT 08 2003

By: C. VASQUEZ, Deputy

Judge: JOHN S. EINHORN

Dept.: 24

CASE NUMBER:

GIC818814

I, STEPHEN LOVE, certify that: I am not a party to the above-entitled case; that on the date shown below, I served the following document(s):

## ORDER DENYING PERMISSION TO FILE NEW LITIGATION

DATED: OCTOBER 7, 2003

On the parties shown below by placing a true copy in a separate envelope, addressed as shown below; each envelope was then sealed and, with postage thereon fully prepaid, deposited in the United States Postal Service at:

San Diego       Vista       El Cajon       Chula Vista       Oceanside       Ramona,      California.

JAMES KINDER  
5775 CAMINITO PULSERA  
LA JOLLA, CA 92037-7160

STEPHEN LOVE  
CLERK OF THE SUPERIOR COURT

Date: October 8, 2003

By: \_\_\_\_\_, Deputy

C. Vasquez

CLERK'S CERTIFICATE OF MAILING

1  
2 F I L E D  
3 Clerk of the Superior Court

4 OCT 07 2003

5 By: C. VASQUEZ, Deputy

6  
7  
8 THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 IN AND FOR THE COUNTY OF SAN DIEGO

10  
11 JAMES M. KINDER, } Case No: GIC 818814  
12 Plaintiff, } ORDER DENYING PERMISSION TO FILE  
13 vs. } NEW LITIGATION (C.C.P. § 391.7b)  
14 TRIAD FINANCIAL CORP., }  
15 Defendant. }

16  
17 The court has reviewed the papers filed by plaintiff on September 18, 2003. JAMES M.  
18 KINDER'S application for an order granting vexatious litigant permission to file new litigation  
19 is denied pursuant to California Code of Civil Procedure § 391.7 for the reasons stated below.

20 In his complaint plaintiff alleges that defendant has initiated telephone calls to his phone  
21 in violation of the federal Telephone Consumer Protection Act of 1991. The specific violation  
22 alleged is multiple calls from an automated dialing system to his voice mail, which is assigned to  
23 a paging service.

24 Plaintiff has not filed any declarations, nor is his Complaint verified. Without some form  
25 of evidence this court has nothing but bare allegations upon which to base it's ruling. These  
26 allegations, both in their facts and evidentiary value, are insufficient for this court to conclude  
27 this action has sufficient potential merit to allow plaintiff to proceed and is not simply filed to  
28 harass the defendant. In addition, plaintiff is aware of the factual and legal issues presented by

1 this action and appears to have drafted his unverified complaint ambiguously in order to avoid  
2 those same issues.

3 This court takes Judicial Notice pursuant to California Evidence Code § 452 of the file in  
4 case number GIC 789588. That action involved many of the same issues as does this action.  
5 This Court specifically takes Judicial Notice of the order granting summary judgment in favor of  
6 the defendant wherein the court found, with respect to plaintiff's phone number, as follows: "the  
7 number is not "assigned to a paging service" because it is undisputed that the number is not  
8 longer used in conjunction with a pager. Instead, the number is assigned to a voicemail service  
9 and Mr. Kinder is not charged based on the amount of calls received. The ordinary and plain  
10 meaning of the term "paging service" suggests a paid service in which the user is alerted each  
11 time a call is made to the number. This is not analogous to a voicemail service in which the user  
12 periodically calls the service to retrieve messages." Because the only evidence before this court  
13 is that the number is not assigned to a paging service, as is required by 47 U.S.C. 227, the  
14 complaint has no merit.

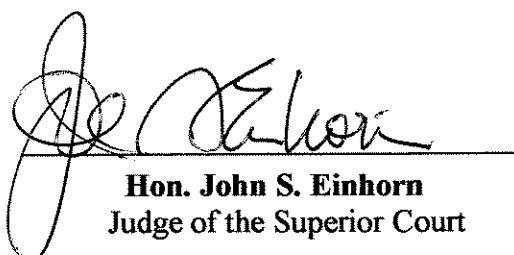
15 This court further takes note that there were factual issues as to whether the 999-9999  
16 number was randomly generated or was a default number, or was otherwise intentionally entered  
17 in the system, and whether a random number generator was, in fact, used. Those same issues are  
18 present here and plaintiff makes no attempt to provide this court with any evidence that they  
19 would be resolved in his favor.

20 Plaintiff is has a legal education and, based thereon, is presumed to understand the legal  
21 impediments these findings present in the present case..

22 Therefore, this court finds that this litigation does not have merit and has been filed for  
23 the purpose of harassment and/or delay.

24 IT IS SO ORDERED.

25 Dated this 7<sup>th</sup> day of October, 2003. By:



Hon. John S. Einhorn  
Judge of the Superior Court

# EXHIBIT 15

1 Chris Reichman SBN 250485  
2 3129 India Street  
3 San Diego, CA 92103-6014  
Telephone: (619) 297-8888  
Facsimile: (619) 295-1401

4 Attorney for Plaintiff JAMES M. KINDER, an individual

F I L E D

Clerk of the Superior Court

DEC 5 2007

By: L. McALISTER, Deputy

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8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 FOR THE COUNTY OF SAN DIEGO

10

11 JAMES M. KINDER, ) CASE NO. 37-2007-00082553-CU-MC-CTL  
12 Plaintiff, )  
13 v. ) COMPLAINT FOR:  
14 THE ACCOUNTING ANGELS, ) Violation(s) of Telephone Consumer  
DALE CARLSON, and DOES ) Protection Act of 1991  
15 1 through 100, inclusive. ) Violation(s) of 47 C.F.R. §68.318 (d)  
16 Defendants. ) Business and Professions  
Code § 17538.43 (b)  
Conversion  
Trespass to Chattel  
Unfair Business Practices

17

18 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
19 follows:

20 **GENERAL ALLEGATIONS**

21 1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
22 Diego, State of California.

23 2. Defendant DALE CARLSON, a resident of California was at all times herein  
24 mentioned the owner and operator of THE ACCOUNTING ANGELS, a business organization of  
25 unknown form doing business in the County of San Diego, State of California, and was at all times  
26 herein mentioned individually and personally responsible for the unsolicited facsimile advertising  
27 alleged herein.

28 3. Plaintiff is unaware of the true names and capacities of defendants sued herein as

1 Chris Reichman SBN 250485  
 2 3129 India Street  
 2 San Diego, CA 92103-6014  
 Telephone: (619) 297-8888  
 3 Facsimile: (619) 295-1401  
 4 Attorney for Plaintiff JAMES M. KINDER, an individual  
 5  
 6  
 7

**F I L E D**

**Clerk of the Superior Court**

**DEC 5 2007**

**By: L McALISTER, Deputy**

8 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
 9 **FOR THE COUNTY OF SAN DIEGO**

10  
 11 JAMES M. KINDER, ) CASE NO. 37-2007-00082552-CU-MC-CTL  
 12 Plaintiff, )  
 13 v. )  
 14 TAMMY POCKNETT dba )  
 15 SELECTIVE COMPUTER TRAINING, )  
 and DOES 1 through 100, inclusive. )  
 16 Defendants. )  
 17  
 18 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
 19 follows:

20 **GENERAL ALLEGATIONS**

21 1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
 22 Diego, State of California.

23 2. Defendant TAMMY POCKNETT, a resident of California, was at all times herein  
 24 mentioned the owner and operator of SELECTIVE COMPUTER TRAINING, doing business in the  
 25 County of San Diego, State of California, and was at all times herein mentioned individually and  
 26 personally responsible for the unsolicited facsimile advertising alleged herein.

27 3. Plaintiff is unaware of the true names and capacities of defendants sued herein as  
 28 DOES 1 through 100, inclusive, and therefore sues these defendants by such fictitious names.

1 Chris Reichman SBN 250485  
2 3129 India Street  
3 San Diego, CA 92103-6014  
Telephone: (619) 297-8888  
Facsimile: (619) 295-1401

4 Attorney for Plaintiff JAMES M. KINDER, an individual

F I L E D

**Clerk of the Superior Court**

DEC 5 2007

By: L. McALISTER, Deputy

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO**

11 JAMES M. KINDER, ) CASE NO. 37-2007-00082551-CU-MC-CTL  
12 Plaintiff, )  
13 v. )  
14 SARAH ROWAN WILSON, VERITAS )  
15 FINANCIAL REAL ESTATE GROUP, Inc., )  
and DOES 1 through 100, inclusive. )  
16 Defendants. )  
17 )  
COMPLAINT FOR:  
Violation(s) of Telephone Consumer  
Protection Act of 1991  
Business and Professions  
Code § 17538.43 (b)  
Conversion  
Trespass to Chattel  
Unfair Business Practices

18 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
19 follows:

## **GENERAL ALLEGATIONS**

21       1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
22 Diego, State of California.

23       2.     Defendant SARAH ROWAN WILSON, a resident of California, at all times herein  
24 mentioned represented Defendant VERITAS FINANCIAL REAL ESTATE GROUP, Inc., a  
25 California corporation doing business in the County of San Diego, State of California, and was at  
26 all times herein mentioned individually and personally responsible for the unsolicited facsimile  
27 advertising alleged herein.

3. Plaintiff is unaware of the true names and capacities of defendants sued herein as

1 Chris Reichman SBN 250485  
 2 3129 India Street  
 3 San Diego, CA 92103-6014  
 Telephone: (619) 297-8888  
 Facsimile: (619) 295-1401  
 4 Attorney for Plaintiff JAMES M. KINDER, an individual

F I L E D  
 Clerk of the Superior Court

DEC 5 2007

By: L McALISTER, Deputy

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8 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
 9 **FOR THE COUNTY OF SAN DIEGO**

10  
 11 JAMES M. KINDER, ) CASE NO. 37-2007-00082550-CU-MC-CTL  
 12 Plaintiff, )  
 13 v. ) **COMPLAINT FOR:**  
 14 SEAT COVERS UNLIMITED, Inc., )  
 15 DANIEL BORDERO, and DOES 1 )  
 through 100, inclusive )  
 16 Defendants. )  
 17 \_\_\_\_\_)

18 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
 19 follows:

20 **GENERAL ALLEGATIONS**

21 1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
 22 Diego, State of California.

23 2. Defendant DANIEL BORDERO, a resident of Arizona, was at all times herein  
 24 mentioned the owner and operator of Defendant SEAT COVERS UNLIMITED, Inc., an Arizona  
 25 corporation doing business in the County of San Diego, State of California, and was at all times  
 26 herein mentioned individually and personally responsible for the unsolicited facsimile advertising  
 27 alleged herein.

28 3. Plaintiff is unaware of the true names and capacities of defendants sued herein as

1 Chris Reichman SBN 250485  
3129 India Street  
2 San Diego, CA 92103-6014  
Telephone: (619) 297-8888  
3 Facsimile: (619) 295-1401

4 Attorney for Plaintiff JAMES M. KINDER, an individual

F I L E D  
Clerk of the Superior Court  
DEC 5 2007  
By: L McALISTER, Deputy

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO**

18 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
19 follows:

## **GENERAL ALLEGATIONS**

21       1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
22 Diego, State of California.

23       2.     Defendant ANDREW HANNA, a California resident, was at all times herein  
24 mentioned the owner and operator of Defendant GLOBAL PREMIER DEVELOPMENT, Inc., a  
25 California corporation doing business in the County of San Diego, State of California, and was at  
26 all times herein mentioned individually and personally responsible for the unsolicited facsimile  
27 advertising alleged herein.

3. Plaintiff is unaware of the true names and capacities of defendants sued herein as

1 Chris Reichman SBN 250485  
2 3129 India Street  
3 San Diego, CA 92103-6014  
4 Telephone: (619) 297-8888  
5 Facsimile: (619) 295-1401

6 Attorney for Plaintiff JAMES M. KINDER, an individual

E I L E D

**Clerk of the Superior Court**

DEC 5 2007

**By: L. McALISTER, Deputy**

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO**

11 JAMES M. KINDER, ) CASE NO. 37-2007-00082548-CU-MC-CTL  
12 Plaintiff, )  
13 v. )  
14 FIRST-TRANS PAYMENT )  
15 SOLUTIONS, LLC, TYLER LONG, )  
and DOES 1 through 100, inclusive )  
16 Defendants. )  
17 )  
COMPLAINT FOR:  
Violation(s) of Telephone Consumer  
Protection Act of 1991  
Conversion  
Trespass to Chattel  
Unfair Business Practices

18 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
19 follows:

## **GENERAL ALLEGATIONS**

21       1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
22 Diego, State of California.

23       2.     Defendant TYLER LONG, residency unknown, was at all times herein mentioned  
24 the owner and operator of Defendant FIRST-TRANS PAYMENT SOLUTIONS, LLC, a  
25 Georgia company doing business in the County of San Diego, State of California, and was at all  
26 times herein mentioned individually and personally responsible for the unsolicited facsimile  
27 advertising alleged herein.

3. Plaintiff is unaware of the true names and capacities of defendants sued herein as

1      Chris Reichman SBN 250485  
1      3129 India Street  
2      San Diego, CA 92103-6014  
2      Telephone: (619) 297-8888  
3      Facsimile: (619) 295-1401

4 Attorney for Plaintiff JAMES M. KINDER, an individual

FILED  
Clerk of the Superior Court

DEC 5 2007

By: L McALISTER, Deputy

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO**

18 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
19 follows:

## **GENERAL ALLEGATIONS**

21       1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
22 Diego, State of California.

23       2.     Defendant REID SMITH, residency unknown, was at all times herein mentioned  
24 representing Defendant EXTREME RESEARCH, Inc., a Florida corporation doing business in  
25 the County of San Diego, State of California, and was at all times herein mentioned individually  
26 and personally responsible for the unsolicited facsimile advertising alleged herein.

27       3. Plaintiff is unaware of the true names and capacities of defendants sued herein as  
28       DOES 1 through 100, inclusive, and therefore sues these defendants by such fictitious names.

1 Chris Reichman SBN 250485  
2 3129 India Street  
3 San Diego, CA 92103-6014  
Telephone: (619) 297-8888  
Facsimile: (619) 295-1401  
4 Attorney for Plaintiff JAMES M. KINDER, an individual

F I L E D  
Clerk of the Superior Court

DEC 5 2007

By: L McALISTER, Deputy

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO

10  
11 JAMES M. KINDER, ) CASE NO. 37-2007-00082546-CU-MC-CTL  
12 Plaintiff, )  
13 v. ) COMPLAINT FOR:  
14 CRYSTAL WILLIAMS dba ) Violation(s) of Telephone Consumer  
15 COMPUTER LEARNING SOLUTIONS, ) Protection Act of 1991  
and DOES 1 through 100, inclusive. ) Business and Professions  
16 Defendants. ) Code § 17538.43 (b)  
17 ) Conversion  
18 ) Trespass to Chattel  
19 ) Unfair Business Practices

COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as follows:

**GENERAL ALLEGATIONS**

21 1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
22 Diego, State of California.

23 2. Defendant CRYSTAL WILLIAMS dba COMPUTER LEARNING SOLUTIONS,  
24 a resident of California, was at all times herein mentioned doing business in the County of San  
25 Diego, State of California, and was at all times herein mentioned individually and personally  
26 responsible for the unsolicited facsimile advertising alleged herein.

27 3. Plaintiff is unaware of the true names and capacities of defendants sued herein as  
28 DOES 1 through 100, inclusive, and therefore sues these defendants by such fictitious names.

1 Chris Reichman SBN 250485  
3129 India Street  
2 San Diego, CA 92103-6014  
Telephone: (619) 297-8888  
3 Facsimile: (619) 295-1401

4 Attorney for Plaintiff JAMES M. KINDER, an individual

**F I L E D**  
Clerk of the Superior Court

DEC 5 2007

By: L. McALISTER, Deputy

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO**

10  
11 JAMES M. KINDER, ) CASE NO. 37-2007-00082544-CU-MC-CTL  
12 Plaintiff, )  
13 v. )  
14 BLOSSOM VALLEY MORTGAGE, Inc., )  
15 RICHARD LANES, JAY KISTER, MATT )  
16 KISTER, and DOES 1 through 100, inclusive. )  
17 Defendants. )  
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18 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
19 follows:

## **GENERAL ALLEGATIONS**

21       1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
22 Diego, State of California.

23        2. Defendants RICHARD LANES, JAY KISTER, and MATT KISTER, residents of  
24 California, were at all times herein mentioned the principals of Defendant BLOSSOM VALLEY  
25 MORTGAGE, Inc., a California corporation doing business in the County of San Diego, State of  
26 California, and were at all times herein mentioned individually and personally responsible for the  
27 unsolicited facsimile advertising alleged herein.

3. Plaintiff is unaware of the true names and capacities of defendants sued herein as

1 Chris Reichman SBN 250485  
3129 India Street  
2 San Diego, CA 92103-6014  
Telephone: (619) 297-8888  
3 Facsimile: (619) 295-1401

4 Attorney for Plaintiff JAMES M. KINDER, an individual

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**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO**

10 ) 37-2007-00082804-CU-MC-CTL  
11 JAMES M. KINDER, ) CASE NO.  
12 ) Plaintiff,  
13 v. )  
14 KNOWLEDGE NETWORKS, Inc., ) COMPLAINT FOR DAMAGES,  
15 and DOES 1 through 100, inclusive, ) INCLUDING PUNITIVE DAMAGES,  
16 ) INTEREST AND ATTORNEY'S FEES,  
17 Defendants. ) AND FOR INJUNCTIVE RELIEF  
 ) Violation(s) of Telephone Consumer  
 ) Protection Act of 1991  
 ) Violation(s) of California Civil Code § 1770  
 ) (a) (22) (A)  
 ) Trespass to Chattel  
 ) Unfair Business Practices

19 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
20 follows:

## GENERAL ALLEGATIONS

22       1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
23 Diego, State of California.

24       2.     Defendant KNOWLEDGE NETWORKS, Inc. is, and at all times herein mentioned  
25 was, a Delaware Corporation, doing business in the County of San Diego, State of California.

26       3. Plaintiff is unaware of the true names and capacities of defendants sued herein as  
27 DOES 1 through 100, inclusive, and therefore sues these defendants by such fictitious names.  
28 Plaintiff will amend this complaint to allege their true names and capacities when ascertained.

1 Chad Austin, Esq. SBN 235457      *Chad Austin, Esq.*  
2 3129 India Street      Superior Court  
3 San Diego, CA 92103-6014      DEC 07 2007  
4 Telephone: (619) 297-8888  
5 Facsimile: (619) 295-1401      By: K. BROWN, Deputy  
6 Attorney for Plaintiff JAMES M. KINDER, an individual

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO

11 JAMES M. KINDER, ) 37-2007-00082713-CU-MC-CTL  
12 Plaintiff, ) CASE NO.  
13 v. )  
14 INSWEB CORPORATION, INSWEB ) COMPLAINT FOR DAMAGES,  
15 INSURANCE SERVICES, Inc. and DOES 1 ) INCLUDING PUNITIVE DAMAGES,  
through 100, inclusive, ) INTEREST AND ATTORNEY'S FEES,  
16 Defendants. ) AND FOR INJUNCTIVE RELIEF  
17 )  
 ) Violations of Telephone Consumer  
 ) Protection Act of 1991  
 ) Violations of California Civil Code § 1770  
 ) (a) (22) (A)  
 ) Trespass to Chattel  
 ) Unfair Business Practices

19 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
20 follows:

## **GENERAL ALLEGATIONS**

22       1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
23 Diego, State of California.

24       2. Defendant INSWEB CORPORATION was at all times herein mentioned a Delaware  
25 corporation, doing business in the County of San Diego, State of California and Defendant INSWEB  
26 INSURANCE SERVICES, Inc. was at all times herein mentioned a California corporation, doing  
27 business in the County of San Diego, State of California.

3. Plaintiff is unaware of the true names and capacities of defendants sued herein as

1 Chris Reichman SBN 250485  
2 3129 India Street  
3 San Diego, CA 92103-6014  
4 Telephone: (619) 297-8888  
5 Facsimile: (619) 295-1401  
6 Attorney for Plaintiff JAMES M. KINDER, an individual  
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F I L E D

Clerk of the Superior Court

DEC 5 2007

By: L McALISTER, Deputy

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO

10  
11 JAMES M. KINDER, ) CASE NO. 37-2007-00082537-CU-MC-CTL  
12 Plaintiff, )  
13 v. ) COMPLAINT FOR:  
14 HERITAGE BIOGRAPHICAL ) Violation(s) of Telephone Consumer  
15 PUBLICATIONS, Inc., and DOES 1 ) Protection Act of 1991  
16 through 100, inclusive ) Conversion  
17 Defendants. ) Trespass to Chattel  
18 ) Unfair Business Practices  
19  
20 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
21 follows:

**GENERAL ALLEGATIONS**

21 1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
22 Diego, State of California.

23 2. Defendant HERITAGE BIOGRAPHICAL PUBLICATIONS, Inc., a New York  
24 corporation, was at all times herein mentioned doing business in the County of San Diego, State  
25 of California, and was at all times herein mentioned individually and personally responsible for  
26 the unsolicited facsimile advertising alleged herein.

27 3. Plaintiff is unaware of the true names and capacities of defendants sued herein as  
28 DOES 1 through 100, inclusive, and therefore sues these defendants by such fictitious names.

F I E D

Clerk of the Superior Court

DEC 5 2007

By: L McALISTER, Deputy  
Clerk of the Superior Court

DEC 5 2007

By: L McALISTER, Deputy

1 Chris Reichman SBN 250485  
 2 3129 India Street  
 3 San Diego, CA 92103-6014  
 Telephone: (619) 297-8888  
 Facsimile: (619) 295-1401

4 Attorney for Plaintiff JAMES M. KINDER, an individual

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## 8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

9

## FOR THE COUNTY OF SAN DIEGO

10

11 JAMES M. KINDER,	) CASE NO. 37-2007-00082538-CU-MC-CTL
12 Plaintiff,	) COMPLAINT FOR:
13 v.	) Violation(s) of Telephone Consumer
14 WINDSOR CAPITAL MORTGAGE	) Protection Act of 1991
15 CORPORATION, FRED TRANA,	) Business and Professions
16 and DOES 1 through 100, inclusive.	) Code § 17538.43 (b)
17 Defendants.	) Conversion
	) Trespass to Chattel
	) Unfair Business Practices

18 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
 19 follows:

20 GENERAL ALLEGATIONS

21 1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
 22 Diego, State of California.

23 2. Defendant FRED TRANA, of unknown residency, was at all times herein mentioned  
 24 the President of Defendant WINDSOR CAPITAL MORTGAGE CORPORATION, a California  
 25 corporation doing business in the County of San Diego, State of California, and was at all times  
 26 herein mentioned individually and personally responsible for the unsolicited facsimile advertising  
 27 alleged herein.

28 3. Plaintiff is unaware of the true names and capacities of defendants sued herein as

1 Chris Reichman SBN 250485  
2 3129 India Street  
3 San Diego, CA 92103-6014  
Telephone: (619) 297-8888  
Facsimile: (619) 295-1401  
4 Attorney for Plaintiff JAMES M. KINDER, an individual

F I L E D  
Clerk of the Superior Court

DEC 5 2007

By: L. McALISTER, Deputy

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO

10  
11 JAMES M. KINDER, ) CASE NO. 37-2007-00082539-CU-MC-CTL  
12 Plaintiff, )  
13 v. )  
14 ZINYAW, LLC, and DOES )  
15 1 through 100, inclusive, )  
16 Defendants. )  
17  
18 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
19 follows:

20 **GENERAL ALLEGATIONS**

21 1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
22 Diego, State of California.

23 2. Defendant ZINYAW, LLC, a Texas corporation doing business in the County of  
24 San Diego, State of California, and was at all times herein mentioned individually and personally  
25 responsible for the unsolicited facsimile advertising alleged herein.

26 3. Plaintiff is unaware of the true names and capacities of defendants sued herein as  
27 DOES 1 through 100, inclusive, and therefore sues these defendants by such fictitious names.  
28 Plaintiff will amend this complaint to allege their true names and capacities when ascertained.

1 Chris Reichman SBN 250485  
 2 3129 India Street  
 3 San Diego, CA 92103-6014  
 Telephone: (619) 297-8888  
 Facsimile: (619) 295-1401

4 Attorney for Plaintiff JAMES M. KINDER, an individual

F I L E D

Clerk of the Superior Court

DEC 5 2007

By: L. McALISTER, Deputy

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 FOR THE COUNTY OF SAN DIEGO

11 JAMES M. KINDER,	) CASE NO. 37-2007-00082540-CU-MC-CTL
12 v.	) COMPLAINT FOR:
13 WORLDWIDE INDUSTRIAL	) Violation(s) of Telephone Consumer
14 ENTERPRISES, Inc., FRANK TANTALO	) Protection Act of 1991
15 and DOES 1 through 100, inclusive,	) Violation(s) of 47 C.F.R. §68.318 (d)
16 Defendants.	) Conversion
	) Trespass to Chattel
	) Unfair Business Practices

18 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
 19 follows:

20 **GENERAL ALLEGATIONS**

21 1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
 22 Diego, State of California.

23 2. Defendant FRANK TANTALO, a New York resident, was at all times herein  
 24 mentioned the owner and operator of Defendant WORLDWIDE INDUSTRIAL ENTERPRISES,  
 25 Inc., a New York corporation doing business in the County of San Diego, State of California, and  
 26 was at all times herein mentioned individually and personally responsible for the unsolicited  
 27 facsimile advertising alleged herein.

28 3. Plaintiff is unaware of the true names and capacities of defendants sued herein as

1 Chris Reichman SBN 250485  
2 3129 India Street  
3 San Diego, CA 92103-6014  
Telephone: (619) 297-8888  
Facsimile: (619) 295-1401

4 Attorney for Plaintiff JAMES M. KINDER, an individual

**F I L E D**

DEC 5 2007

**By: L. McALISTER, Deputy**

**By: L. McALISTER, Deputy**

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO**

JAMES M. KINDER,  
Plaintiff,  
v.  
U CAN 2 OPPORTUNITY, Inc.,  
MARCO CARBAJO, and DOES 1  
through 100, inclusive  
Defendants.

) CASE NO.37-2007-00082541-CU-MC-CTL

) COMPLAINT FOR:  
Violation(s) of Telephone Consumer  
Protection Act of 1991  
Conversion  
Trespass to Chattel  
Unfair Business Practices

COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as follows:

## **GENERAL ALLEGATIONS**

1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San Diego, State of California.

2. Defendant MARCO CARBAJO, of unknown residency, was at all times herein mentioned the owner and operator of Defendant U CAN 2 OPPORTUNITY, Inc., a Florida corporation doing business in the County of San Diego, State of California, and was at all times herein mentioned individually and personally responsible for the unsolicited facsimile advertising alleged herein.

3. Plaintiff is unaware of the true names and capacities of defendants sued herein as

1 Chris Reichman SBN 250485  
 2 3129 India Street  
 2 San Diego, CA 92103-6014  
 Telephone: (619) 297-8888  
 3 Facsimile: (619) 295-1401

4 Attorney for Plaintiff JAMES M. KINDER, an individual

F I L E D

Clerk of the Superior Court

DEC 5 2007

By: L McALISTER, Deputy

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8 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **FOR THE COUNTY OF SAN DIEGO**

10	JAMES M. KINDER,	) CASE NO. 37-2007-00082542-CU-MC-CTL
11	Plaintiff,	) COMPLAINT FOR:
12	v.	) Violation(s) of Telephone Consumer
13	TIM CURREN dba CURREN FUNDING	) Protection Act of 1991
14	and DOES 1 through 100, inclusive.	) Business and Professions
15	Defendants.	) Code § 17538.43 (b)
16		) Conversion
17		) Trespass to Chattel
		) Unfair Business Practices
		) California Business & Professions
		) Code §22162

18 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
 19 follows:

20 **GENERAL ALLEGATIONS**

21 1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
 22 Diego, State of California.

23 2. Defendant TIM CURREN, a resident of California, was at all times herein mentioned  
 24 the owner and operator of CURREN FUNDING, doing business in the County of San Diego, State  
 25 of California, and was at all times herein mentioned individually and personally responsible for the  
 26 unsolicited facsimile advertising alleged herein.

27 3. Plaintiff is unaware of the true names and capacities of defendants sued herein as  
 28 DOES 1 through 100, inclusive, and therefore sues these defendants by such fictitious names.

1 Chris Reichman SBN 250485  
2 3129 India Street  
3 San Diego, CA 92103-6014  
Telephone: (619) 297-8888  
Facsimile: (619) 295-1401

4 Attorney for Plaintiff JAMES M. KINDER, an individual

F I L E D  
Clerk of the Superior Court

DEC 5 2007

By: L McALISTER, Deputy

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8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

9

FOR THE COUNTY OF SAN DIEGO

10

11 JAMES M. KINDER, ) CASE NO. 37-2007-00082543-CU-MC-CTL  
12 Plaintiff, )  
13 v. ) COMPLAINT FOR:  
14 SHIRLEY LEJEUNE dba WEB-LINK ) Violation(s) of Telephone Consumer  
15 TECHNOLOGIES, and DOES 1 ) Protection Act of 1991  
through 100, inclusive ) Conversion  
16 Defendants. ) Trespass to Chattel  
Unfair Business Practices  
17

18 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
19 follows:

20 **GENERAL ALLEGATIONS**

21 1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
22 Diego, State of California.

23 2. Defendant SHIRLEY LEJEUNE, a resident of Ohio, was at all times herein  
24 mentioned the owner and operator of WEB-LINK TECHNOLOGIES, doing business in the  
25 County of San Diego, State of California, and was at all times herein mentioned individually and  
26 personally responsible for the unsolicited facsimile advertising alleged herein.

27 3. Plaintiff is unaware of the true names and capacities of defendants sued herein as  
28 DOES 1 through 100, inclusive, and therefore sues these defendants by such fictitious names.

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4 Attorney for Plaintiff JAMES M. KINDER, an individual

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Clerk of the Superior Court

DEC 10 2007

BY: B. Follis, Clerk

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8 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **FOR THE COUNTY OF SAN DIEGO**

10

11 JAMES M. KINDER, ) CASE NO. 37-2007-00083656-CU-MC-CTL  
12 Plaintiff, )  
13 v. )  
14 OWW LIQUIDATORS, LLC, CASE )  
FURNITURE & DESIGN, LLC, BRUCE )  
15 SANBORN, MONTE KNUDSON, )  
and DOES 1 through 100, inclusive. )  
16 Defendants. )  
17

**COMPLAINT FOR:**

**Violation(s) of Telephone Consumer  
Protection Act of 1991**  
**Violation(s) of 47 C.F.R. §68.318 (d)**  
**Conversion**  
**Trespass to Chattel**  
**Unfair Business Practices**

18 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
19 follows:

20 **GENERAL ALLEGATIONS**

21 1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
22 Diego, State of California.

23 2. Defendants BRUCE SANBORN and MONTE KNUDSON, residents of Arizona,  
24 were at all times herein mentioned owners, operators, and/or managers of Defendants OWW  
25 LIQUIDATORS, LLC and CASE FURNITURE & DESIGN, LLC, Arizona Limited Liability  
26 Companies doing business in the County of San Diego, State of California, and were at all times  
27 herein mentioned individually and personally responsible for the unsolicited facsimile advertising  
28 alleged herein.

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7

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SAN DIEGO COUNTY, CA

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9  
10 FOR THE COUNTY OF SAN DIEGO

11 JAMES M. KINDER, ) CASE NO. 37-2007-00083528-CL-MC-CTL  
12 Plaintiff, ) Limited Civil Case [Amount in Controversy  
13 v. ) is less than \$10,000.00]  
14 WYSE FINANCIAL SERVICES, Inc. and ) COMPLAINT FOR DAMAGES  
15 DOES 1 through 100, inclusive, ) Violations of Telephone Consumer  
16 Defendants. ) Protection Act of 1991

17 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
18 follows:

19 **GENERAL ALLEGATIONS**

20 1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
21 Diego, State of California.

22 2. Defendant WYSE FINANCIAL SERVICES, Inc. (hereinafter referred to as  
23 "Defendant"), was at all times herein mentioned a Colorado corporation, doing business in the  
24 County of San Diego, State of California.

25 3. Plaintiff is unaware of the true names and capacities of defendants sued herein as  
26 DOES 1 through 100, inclusive, and therefore sues these defendants by such fictitious names.  
27 Plaintiff will amend this complaint to allege their true names and capacities when ascertained.  
28 Plaintiff is informed and believes and thereon alleges that each of the fictitiously named defendants

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4      Attorney for Plaintiff JAMES M. KINDER, an individual

F I L E D  
Clerk of the Superior Court

DEC 10 2007

BY: B. Follis, Clerk

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8                   **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
 9                   **FOR THE COUNTY OF SAN DIEGO**

10

11      JAMES M. KINDER,	)	CASE NO. <b>37-2007-00083547-CU-NP-CTL</b>
12                          Plaintiff,	)	<b>COMPLAINT FOR:</b>
13      v.	)	<b>Violation(s) of Telephone Consumer</b>
14      AMERICAN AUTOMOTIVE	)	<b>Protection Act of 1991</b>
15      EQUIPMENT, Inc., and DOES	)	<b>Violation(s) of 47 C.F.R. §68.318 (d)</b>
16      1 through 100, inclusive.	)	<b>Conversion</b>
17                          Defendants.	)	<b>Trespass to Chattel</b>
	)	<b>Unfair Business Practices</b>

18      COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
 19 follows:

20                   **GENERAL ALLEGATIONS**

21      1.      Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
 22 Diego, State of California.

23      2.      Defendant AMERICAN AUTOMOTIVE EQUIPMENT, Inc., a New York  
 24 corporation, was at all times herein mentioned doing business in the County of San Diego, State  
 25 of California, and was at all times herein mentioned individually and personally responsible for  
 26 the unsolicited facsimile advertising alleged herein.

27      3.      Plaintiff is unaware of the true names and capacities of defendants sued herein as  
 28 DOES 1 through 100, inclusive, and therefore sues these defendants by such fictitious names.

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**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO**

11 JAMES M. KINDER, ) CASE NO. 37-2007-00083548-CU-MC-CTL  
12 Plaintiff, )  
13 v. )  
14 THE HOT LEAD COMPANY, L.L.C., LARRY ) Violation(s) of Telephone Consumer  
15 KROUSE, DAVID VAUGHN, SCOTT ) Protection Act of 1991  
16 NICKASON, DAVID CRANDALL, GREG ) Violation(s) of 47 C.F.R. §68.318 (d)  
17 HORNE, MIKE HORNE, MITCH MARTINEZ,) Conversion  
BOB MICHAELS, DON MAGEE, DAVID ) Trespass to Chattel  
BEST, and DOES 1 through 100, inclusive. ) Unfair Business Practices  
18 Defendants. )

19 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
20 follows:

## **GENERAL ALLEGATIONS**

22       1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
23 Diego, State of California.

24       2. Defendant THE HOT LEAD COMPANY, L.L.C., was at all times herein  
25 mentioned a business entity registered in Nevada whose principle place of business was in Texas  
26 and was at all times herein mentioned individually and personally responsible for the unsolicited  
27 facsimile advertising alleged herein. Defendant LARRY KROUSE, of unknown residency, was  
28 at all times herein mentioned a principal of Defendant THE HOT LEAD COMPANY, L.L.C.,

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Clerk of the Superior Court

DEC 10 2007

BY: B. Follis, Clerk

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO**

18 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
19 follows:

## **GENERAL ALLEGATIONS**

21       1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
22 Diego, State of California.

23       2. Defendant AUSTIN SOFTWARE ARCHITECTS, a Delaware company with  
24 primary place of business in Texas, was at all times herein mentioned doing business in the  
25 County of San Diego, State of California, and was at all times herein mentioned individually and  
26 personally responsible for the unsolicited facsimile advertising alleged herein.

27       3. Plaintiff is unaware of the true names and capacities of defendants sued herein as  
28 DOES 1 through 100, inclusive, and therefore sues these defendants by such fictitious names.

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Clerk of the Superior Court

DEC 5 2007

By: L. McALISTER, Deputy

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 FOR THE COUNTY OF SAN DIEGO

10  
11 JAMES M. KINDER, ) CASE NO. 37-2007-00082554-CU-MC-CTL  
12 Plaintiff, )  
13 v. ) COMPLAINT FOR:  
14 MONIQUE NIZNIK, and ) Violation(s) of Telephone Consumer  
15 DOES 1 through 100, inclusive. ) Protection Act of 1991  
16 Defendants. ) Violation(s) of 47 C.F.R. §68.318 (d)  
Business and Professions  
Code § 17538.43 (b)  
Conversion  
Trespass to Chattel  
Unfair Business Practices

17  
18 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
19 follows:

20 **GENERAL ALLEGATIONS**

21 1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
22 Diego, State of California.

23 2. Defendant MONIQUE NIZNIK, was at all times herein a resident of California doing  
24 business in the County of San Diego, State of California, and was at all times herein mentioned  
25 individually and personally responsible for the unsolicited facsimile advertising alleged herein.

26 3. Plaintiff is unaware of the true names and capacities of defendants sued herein as  
27 DOES 1 through 100, inclusive, and therefore sues these defendants by such fictitious names.  
28 Plaintiff will amend this complaint to allege their true names and capacities when ascertained.

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DEC 5 2007

**By: L. McALISTER, Deputy**

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO**

18 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
19 follows:

## **GENERAL ALLEGATIONS**

1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
Diego, State of California.

23       2. Defendant TOM HOOVER, a resident of California, was at all times herein  
24 mentioned the owner and operator of Defendant LEAD SYSTEMS, Inc., a California corporation  
25 doing business in the County of San Diego, State of California, and was at all times herein  
26 mentioned individually and personally responsible for the unsolicited facsimile advertising alleged  
27 herein.

28 3. Plaintiff is unaware of the true names and capacities of defendants sued herein as

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F I L E D  
*Clerk of the Superior Court*

DEC 5 2007

*By: L McALISTER, Deputy*

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 FOR THE COUNTY OF SAN DIEGO

11 JAMES M. KINDER,	) CASE NO. 37-2007-00082556-CU-MC-CTL
12 Plaintiff,	) COMPLAINT FOR:
13 v.	) Violation(s) of Telephone Consumer
14 TERI HAUG dba LYNX MORTGAGE	) Protection Act of 1991
15 and DOES 1 through 100, inclusive.	) Violation(s) of 47 C.F.R. §68.318 (d)
16 Defendants.	) Business and Professions
	) Code § 17538.43 (b)
	) Conversion
	) Trespass to Chattel
	) Unfair Business Practices
	) California Business & Professions
	) Code §22162

18 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
 19 follows:

20 **GENERAL ALLEGATIONS**

21 1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
 22 Diego, State of California.

23 2. Defendant TERI HAUG dba LYNX MORTGAGE, a resident of California, was at  
 24 all times herein mentioned doing business in the County of San Diego, State of California, and was  
 25 at all times herein mentioned individually and personally responsible for the unsolicited facsimile  
 26 advertising alleged herein.

27 3. Plaintiff is unaware of the true names and capacities of defendants sued herein as  
 28 DOES 1 through 100, inclusive, and therefore sues these defendants by such fictitious names.

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### **Clerk of the Superior Court**

DEC 5 2007

**By: L. McALISTER, Deputy**

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF SAN DIEGO**

8 COMES NOW Plaintiff JAMES M. KINDER (hereinafter referred to as "Plaintiff") who alleges as  
9 follows:

## **GENERAL ALLEGATIONS**

21       1. Plaintiff is, and at all times herein mentioned was, a resident of the County of San  
22 Diego, State of California.

23       2. Defendant STEVE BAILEY, a resident of California, was at all times herein  
24 mentioned the owner and operator of Defendant STEVE BAILEY INSURANCE SERVICES, Inc.,  
25 a California corporation doing business in the County of San Diego, State of California, and was at  
26 all times herein mentioned individually and personally responsible for the unsolicited facsimile  
27 advertising alleged herein.

3. Plaintiff is unaware of the true names and capacities of defendants sued herein as